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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:23-CR-00267 JSW
Plaintiff,)	
v.)	JOINT STATUS REPORT AND STIPULATION TO
)	VACATE STATUS, SET SENTENCING
)	HEARING, AND REFER TO PROBATION FOR A
TIMOTHY ALLEN MANLY WILLIAMS,)	PRESENTENCE REPORT; AND [PROPOSED]
Defendant.)	ORDER
)	Re: Dkt. No. 62

UNITED STATES OF AMERICA,)	CASE NOS. 4:23-CR-00268 JSW-1
Plaintiff,)	4:24-CR-00502 JSW
v.)	
)	JOINT STATUS REPORT AND STIPULATION TO
)	VACATE STATUS, CONSOLIDATE AND SET
DANIEL JAMES HARRIS,)	SENTENCING HEARING, AND REFER TO
Defendant.)	PROBATION FOR A PRESENTENCE REPORT;
)	AND [PROPOSED] ORDER
)	Re: Dkt. Nos. 237 (-268), 17 (-502)

STIPULATION AND ~~PROPOSED~~ ORDER

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 ERIC ALLEN ROMBOUGH,

5 Defendant.

) CASE NO. 4:23-CR-00269 JSW-2

) JOINT STATUS REPORT AND STIPULATION TO
) VACATE STATUS, SET SENTENCING
) HEARING, AND REFER TO PROBATION FOR A
) PRESENTENCE REPORT; AND ~~[PROPOSED]~~
) ORDER

) Re: Dkt. No. 605

8 Each of the above-captioned cases are set for status conference hearings on October 7, 2025.

9 Defendant Timothy Allen Manly Williams pleaded guilty to destruction, alteration, and
10 falsification of records in federal investigations; obstruction of official proceedings; and deprivation of
11 rights under color of law on November 28, 2023. Defendant Manly Williams testified in *United States*
12 *v. Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025.

13 Defendant Daniel James Harris pleaded guilty to conspiracy to distribute anabolic steroids;
14 possession of anabolic steroids with the intent to distribute; and attempted possession of anabolic
15 steroids with the intent to distribute in case number 23-CR-00268 JSW-1; and pleaded guilty to bank
16 fraud in case number 24-CR-00502 JSW; on September 17, 2024. Defendant Harris testified in *United*
17 *States v. Devon Wenger*, Case No. 23-CR-268 JSW-2 in April 2025.

18 Defendant Eric Allen Rombough pleaded guilty to conspiracy against rights and deprivation of
19 rights under color of law on January 14, 2025. Defendant Rombough testified in *United States v.*
20 *Morteza Amiri*, Case No. 23-CR-269 JSW-1 in March 2025 and *United States v. Devon Wenger*, Case
21 No. 23-CR-269 JSW-3 in September 2025.

22 Since the setting of the October 7, 2025 status conference hearings, Devon Wenger was
23 convicted at trial in *United States v. Devon Wenger*, Case No. 23-CR-269 JSW-3 and his consolidated
24 sentencing hearing has been set for December 2, 2025.

25 The parties in the above-captioned cases are therefore ready to set sentencing hearings and the
26 parties stipulate and agree that, with the Court's permission, the currently-scheduled status conference
27 hearings be vacated and sentencing hearings be set (including by consolidating proceedings for
28 Defendant Harris in 23-CR-00268 JSW-1 and 24-CR-00502 JSW for purposes of sentencing) on

STIPULATION AND ~~PROPOSED~~ ORDER

1 **January 13, 2026.** The parties also stipulate and agree that the Court refer each of the defendants to
2 United States Probation for preparation of presentence investigation reports in advance of sentencing.

3 The undersigned Assistant United States Attorney certifies that he has obtained approval from
4 the undersigned to file this stipulation and proposed order.

5 **IT IS SO STIPULATED.**

6 DATED: September 29, 2025

7 /s/
ERIC CHENG
ALETHEA SARGENT
ALEXANDRA SHEPARD
Assistant United States Attorneys

10 /s/
RANDY SUE POLLOCK
Counsel for Defendant TIMOTHY ALLEN
MANLY WILLIAMS

14 /s/
JAMES P. VAUGHNS
Counsel for Defendant DANIEL JAMES HARRIS

17 /s/
ANTHONY BRASS
Counsel for Defendant ERIC ALLEN
ROMBOUGH


~~[PROPOSED]~~ ORDER

Based upon the facts and representations set forth in the stipulation of the parties, and good cause shown, IT IS HEREBY ORDERED as follows:

- The status conference hearings set for October 7, 2025 in each of the above-captioned matters shall be VACATED;
- Sentencing for Defendant **Timothy Allen Manly Williams** in Case No. 23-cr-00267 JSW shall be set on **January 13, 2026, at 1:00 p.m.**; the Court also refers this Defendant to United States Probation for preparation of a presentence investigation report;
- Regarding Defendant **Daniel James Harris**, the Court CONSOLIDATES Case Nos. 23-CR-00268 JSW-1 and 24-CR-00502 JSW for purposes of sentencing, and a sentencing hearing for both cases shall be set on **January 13, 2026, at 1:00 p.m.**; the Court also refers this Defendant to United States Probation for preparation of a single presentence investigation report applying to both cases;
- Sentencing for Defendant **Eric Allen Rombough** in Case No. 23-cr-00269-2 shall be set on **January 13, 2026, at 1:00 p.m.**; the Court also refers this Defendant to United States Probation for preparation of a presentence investigation report.

IT IS SO ORDERED.

DATED: September 30, 2025



HON. JEFFREY S. WHITE
United States District Judge